



Your Missouri Courts

Search for Cases by:
[Judicial Links](#) | [eFiling](#) | [Help](#) | [Contact Us](#) | [Print](#)
GrantedPublicAccess [Logoff KATIERICKS88](#)

20SL-CC05124 - PATRICK A FOGERTY V QUIKTRIP CORPORATION (E-CASE)

[Case Header](#) | [Parties & Attorneys](#) | [Docket Entries](#) | [Charges, Judgments & Sentences](#) | [Service Information](#) | [Filings Due](#) | [Scheduled Hearings & Trials](#) | [Civil Judgments](#) | [Garnishments/Execution](#)
[Click here to eFile on Case](#)Sort Date Entries: ☒ Descending
☐ AscendingDisplay Options: [Click here to Respond to Selected Documents](#)

- 12/28/2020 ☐ [Cert Serv Answers Interrog Fil](#)
Certificate of Service; Electronic Filing Certificate of Service.
Filed By: ROBERT JOSEPH RADICE
On Behalf Of: PATRICK A. FOGERTY
- 12/01/2020 ☐ [Cert Serv of Interrog Filed](#)
Certificate of Service; Electronic Filing Certificate of Service.
Filed By: ROBERT JOSEPH RADICE
On Behalf Of: PATRICK A. FOGERTY
- 11/30/2020 ☐ [Certificate of Service](#)
Certificate of Service; Electronic Filing Certificate of Service.
Filed By: KATHERINE MARGARET RICKS
On Behalf Of: QUIKTRIP CORPORATION
- ☐ [Entry of Appearance Filed](#)
Entry of Appearance; Electronic Filing Certificate of Service.
Filed By: KATHERINE MARGARET RICKS
On Behalf Of: QUIKTRIP CORPORATION
- ☐ [Answer Filed](#)
Filed By: MATTHEW JOSEPH REH
- ☐ [Entry of Appearance Filed](#)
Entry of Appearance; Electronic Filing Certificate of Service.
Filed By: MATTHEW JOSEPH REH
On Behalf Of: QUIKTRIP CORPORATION
- 11/02/2020 ☐ [Corporation Served](#)
Document ID - 20-SMCC-9546; Served To - QUIKTRIP CORPORATION; Server - CT CORP; Served Date - 29-OCT-20; Served Time - 00:00:00; Service Type - Territory 30; Reason Description - Served; Service Text - LC
- ☐ [Corporation Served](#)
Document ID - 20-SMCC-9546; Served To - QUIKTRIP CORPORATION; Server - CT CORP; Served Date - 02-NOV-20; Served Time - 00:00:00; Service Type - Territory 30; Reason Description - Assigned to Deputy Sheriff
- 10/19/2020 ☐ [Summons Issued-Circuit](#)
Document ID: 20-SMCC-9546, for QUIKTRIP CORPORATION. Summons Attached in PDF Form for Attorney to Retrieve from Secure Case.Net and Process for Service.
- 10/08/2020 ☐ [Filing Info Sheet eFiling](#)
Filed By: ROBERT JOSEPH RADICE
- ☐ [Pet Filed in Circuit Ct](#)
Petition.
On Behalf Of: PATRICK A. FOGERTY

☐ **Judge Assigned**
DIV 9

20SL-CC05124

Electronically Filed - St Louis County - October 08, 2020 - 04:00 PM

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

PATRICK A. FOGERTY,)	
)	
Plaintiff,)	Cause No.
)	
vs.)	Division No.
)	
QUIKTRIP CORPORATION,)	TRIAL BY JURY DEMANDED
Serve: CT Corporation System, Reg. Agent)	
120 S. Central Avenue)	
St. Louis, MO 63105)	
)	
Defendant.)	

PETITION

Comes now Plaintiff Patrick Fogerty, and for his cause of action against Defendant QuikTrip Corporation, states as follows:

1. Plaintiff is a resident of the State of Missouri.
2. Defendant QuikTrip Corporation is a foreign corporation in good standing which transacts business in the State of Missouri.
3. At all relevant times Defendant acted by and through its agents, servants and/or employees.
4. At all relevant times Defendant owned and operated a QuikTrip located at 4450 Meramec Bottom Road, St. Louis, MO 63129.
5. On September 2, 2020, Plaintiff was a business invitee at Defendant's QuikTrip referenced above, when Plaintiff fell due to water on the floor of the QuikTrip, which was an unsafe condition, and which was caused by Defendant.

6. Defendant knew of the unsafe condition of the wet floor, caused the unsafe condition of the wet floor, but failed to use ordinary care to remove said unsafe condition.

7. Due to Defendant's failure to use ordinary care/negligence as set forth above, Plaintiff sustained serious personal injuries, including a fracture of his spine, injuries to his back, right elbow and left hip. Plaintiff has undergone, and continues to undergo medical treatment, and has incurred, and continues to incur medical expenses.

WHEREFORE, Plaintiff Patrick A. Fogerty prays for judgment against Defendant QuikTrip Corporation in an amount that is fair and reasonable, but in excess of \$25,000.00, exclusive of interest and costs, for pre-judgment interest, post-judgment interest, costs and for whatever further relief this Court deems just and proper.



Robert J. Radice #30697
HORAS, RADICE & ASSOCIATES, LLC
Attorneys for Plaintiff
2123 Marconi Avenue
St. Louis, MO 63110
(314) 241-4505
(314) 241-7779 Fax
bradice@HRmidwestlaw.com



IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: DAVID L VINCENT III	Case Number: 20SL-CC05124
Plaintiff/Petitioner: PATRICK A. FOGERTY	Plaintiff's/Petitioner's Attorney/Address ROBERT JOSEPH RADICE 2123 MARCONI AVENUE SAINT LOUIS, MO 63110
Defendant/Respondent: QUIKTRIP CORPORATION	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Pers Injury-Other	

**SHERIFF FEE
PAID**

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: QUIKTRIP CORPORATION

Alias:

R/A: CT CORPORATION SYSTEM
120 S. CENTRAL AVENUE
ST. LOUIS, MO 63105

COURT SEAL OF



ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SLCADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.

19-OCT-2020

Date

Further Information:

LES

Joan T. Delaney
Clerk

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).
- ☐ other _____

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$._____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

Twenty First Judicial Circuit

NOTICE OF ALTERNATIVE DISPUTE RESOLUTION SERVICES

Purpose of Notice

As a party to a lawsuit in this court, you have the right to have a judge or jury decide your case. However, most lawsuits are settled by the parties before a trial takes place. This is often true even when the parties initially believe that settlement is not possible. A settlement reduces the expense and inconvenience of litigation. It also eliminates any uncertainty about the results of a trial.

Alternative dispute resolution services and procedures are available that may help the parties settle their lawsuit faster and at less cost. Often such services are most effective in reducing costs if used early in the course of a lawsuit. Your attorney can aid you in deciding whether and when such services would be helpful in your case.

Your Rights and Obligations in Court Are Not Affected By This Notice

You may decide to use an alternative dispute resolution procedure if the other parties to your case agree to do so. In some circumstances, a judge of this court may refer your case to an alternative dispute resolution procedure described below. These procedures are not a substitute for the services of a lawyer and consultation with a lawyer is recommended. Because you are a party to a lawsuit, you have obligations and deadlines which must be followed whether you use an alternative dispute resolution procedure or not. **IF YOU HAVE BEEN SERVED WITH A PETITION, YOU MUST FILE A RESPONSE ON TIME TO AVOID THE RISK OF DEFAULT JUDGMENT, WHETHER OR NOT YOU CHOOSE TO PURSUE AN ALTERNATIVE DISPUTE RESOLUTION PROCEDURE.**

Alternative Dispute Resolution Procedures

There are several procedures designed to help parties settle lawsuits. Most of these procedures involve the services of a neutral third party, often referred to as the "neutral," who is trained in dispute resolution and is not partial to any party. The services are provided by individuals and organizations who may charge a fee for this help. Some of the recognized alternative dispute resolutions procedures are:

(1) Advisory Arbitration: A procedure in which a neutral person or persons (typically one person or a panel of three persons) hears both sides and decides the case. The arbitrator's decision is not binding and simply serves to guide the parties in trying to settle their lawsuit. An arbitration is typically less formal than a trial, is usually shorter, and may be conducted in a private setting at a time mutually agreeable to the parties. The parties, by agreement, may select the arbitrator(s) and determine the rules under which the arbitration will be conducted.

(2) Mediation: A process in which a neutral third party facilitates communication between the parties to promote settlement. An effective mediator may offer solutions that have not been considered by the parties or their lawyers. A mediator may not impose his or her own judgment on the issues for that of the parties.

CCADM73

(3) Early Neutral Evaluation (“ENE”): A process designed to bring the parties to the litigation and their counsel together in the early pretrial period to present case summaries before and receive a non-binding assessment from an experienced neutral evaluator. The objective is to promote early and meaningful communication concerning disputes, enabling parties to plan their cases effectively and assess realistically the relative strengths and weaknesses of their positions. While this confidential environment provides an opportunity to negotiate a resolution, immediate settlement is not the primary purpose of this process.

(4) Mini-Trial: A process in which each party and their counsel present their case before a selected representative for each party and a neutral third party, to define the issues and develop a basis for realistic settlement negotiations. The neutral third party may issue an advisory opinion regarding the merits of the case. The advisory opinion is not binding.

(5) Summary Jury Trial: A summary jury trial is a non binding, informal settlement process in which jurors hear abbreviated case presentations. A judge or neutral presides over the hearing, but there are no witnesses and the rules of evidence are relaxed. After the “trial”, the jurors retire to deliberate and then deliver an advisory verdict. The verdict then becomes the starting point for settlement negotiations among the parties.

Selecting an Alternative Dispute Resolution Procedure and a Neutral

If the parties agree to use an alternative dispute resolution procedure, they must decide what type of procedure to use and the identity of the neutral. As a public service, the St. Louis County Circuit Clerk maintains a list of persons who are available to serve as neutrals. The list contains the names of individuals who have met qualifications established by the Missouri Supreme Court and have asked to be on the list. The Circuit Clerk also has Neutral Qualifications Forms on file. These forms have been submitted by the neutrals on the list and provide information on their background and expertise. They also indicate the types of alternative dispute resolution services each neutral provides.

A copy of the list may be obtained by request in person and in writing to: Circuit Clerk, Office of Dispute Resolution Services, 105 South Central Ave., 5th Floor, Clayton, Missouri 63105. The Neutral Qualifications Forms will also be made available for inspection upon request to the Circuit Clerk.

The List and Neutral Qualification Forms are provided only as a convenience to the parties in selecting a neutral. The court cannot advise you on legal matters and can only provide you with the List and Forms. You should ask your lawyer for further information.

CCADM73



Return

SB 11/18

IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: DAVID L VINCENT III	Case Number: 20SL-CC05124
Plaintiff/Petitioner: PATRICK A. FOGERTY	Plaintiff's/Petitioner's Attorney/Address ROBERT JOSEPH RADICE 2123 MARCONI AVENUE SAINT LOUIS, MO 63110
Defendant/Respondent: QUIKTRIP CORPORATION	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Pers Injury-Other	

**SHERIFF FEE
PAID**

FILED

NOV 13 2020

(Date File Stamp)
JOAN M. GILMER
CIRCUIT CLERK ST LOUIS COUNTY

Summons in Civil Case

The State of Missouri to: **QUIKTRIP CORPORATION**

R/A: CT CORPORATION SYSTEM
120 S. CENTRAL AVENUE
ST. LOUIS, MO 63105

Alias:

*30 CT CORP
VW*

COURT SEAL OF



ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SLCADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.

19-OCT-2020

Date

Further Information:
LES

Joan M. Gilmer
Clerk

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) **INTAKE SPECIALIST** (title).
- ☐ other _____ **LCW - B. LOVE** (address)

Served at **CT CORPORATION**

in **St. Louis County** (County/City of St. Louis), MO, on **OCT 29 2020** (date) at **9 AM** (time).

Tom DiAKIN
Printed Name of Sheriff or Server

[Signature]
Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer.

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$ _____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

EXHIBIT A

ST. LOUIS COUNTY
MISSOURI

JAN 12 2021

10/1/21

1000 - 1000
1000 - 1000

10/1/21

1000 - 1000
1000 - 1000

1000 - 1000

1000 - 1000

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

PATRICK A. FOGERTY,)	
)	
Plaintiff,)	
)	
vs.)	No. 20SL-CC05124
)	
QUIKTRIP CORPORATION,)	
)	
Defendant.)	
)	
)	

ENTRY OF APPEARANCE

COMES NOW Matthew J. Reh of Armstrong Teasdale LLP and enters his appearance on behalf of Defendant QuikTrip Corporation.

ARMSTRONG TEASDALE LLP

By: /s/ Matthew J. Reh

Matthew J. Reh, #49418
Katherine Ricks, #70322
7700 Forsyth Blvd., Suite 1800
St. Louis, Missouri 63105
Telephone: 314.621.5070
Fax: 314.621.5065
mreh@atllp.com
kricks@atllp.com

ATTORNEYS FOR DEFENDANT
QUIKTRIP CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2020, the foregoing was filed electronically with the Clerk of Court and will be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Matthew J. Reh

EXHIBIT A

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

PATRICK A. FOGERTY,)	
)	
Plaintiff,)	
)	
vs.)	No. 20SL-CC05124
)	
QUIKTRIP CORPORATION,)	
)	
Defendant.)	
)	
)	

ANSWER

Defendant QuikTrip Corporation (“QT”), by and through counsel, submits the following Answer and Affirmative Defenses to Plaintiff Patrick A. Fogerty’s Petition:

1. QT is without sufficient information or knowledge to admit or deny the allegations contained in Paragraph 1 and, therefore, denies the same.
2. QT admits the allegations in Paragraph 2.
3. The allegations in Paragraph 3 contain legal conclusions to which a response is not required. To the extent a response is deemed required, QT denies the allegations.
4. In response to Paragraph 4, QT denies that it owns, but admits that it operates, the QuikTrip located at 4450 Meramec Bottom Road, St. Louis, MO 63129.
5. QT denies the allegations contained in Paragraph 5.
6. QT denies the allegations contained in Paragraph 6.
7. QT denies the allegations contained in Paragraph 7.

WHEREFORE, Defendant QT prays this Court enter judgment in favor of QT and against Plaintiff, for its costs expended and incurred herein, and for such other and further relief as this Court deems just and proper.

AFFIRMATIVE AND ADDITIONAL DEFENSES

1. QT denies each and every allegation not specifically admitted herein.
2. Plaintiff's Petition for Damages fails to state a claim against QT upon which relief can be granted. QT had no knowledge of the alleged dangerous condition on its property and did not breach any duties owed to Plaintiff.
3. Any injuries or damages sustained by Plaintiff, which QT denies, were directly and/or proximately caused or contributed to by Plaintiff's negligence or fault.
4. Any injuries or damages sustained by Plaintiff, which QT denies, were directly and/or proximately caused or contributed to by the negligence or fault of other persons or entities not within QT's control.
5. Any injuries or damages sustained by Plaintiff, which QT denies, were not caused or contributed to in any degree by any negligence, fault or wrongdoing on the part of QT.
6. If Plaintiff was injured or damaged, which QT denies, to the extent allegations of fault remain as to QT, the fault of Plaintiff and/or other persons or entities involved in the occurrence should be compared and/or apportioned so as to diminish or preclude recovery from QT.
7. Plaintiff failed to use ordinary care while present at QT at or near the time of the alleged occurrence and such failure directly caused or contributed to any and/or all of Plaintiff's alleged damages.
8. Plaintiff failed to keep a careful lookout and such failure caused or contributed to any and/or all of Plaintiff's alleged damages.
9. QT contests the nature and extent of Plaintiff's alleged damages.

10. If Plaintiff suffered any damage, which QT denies, such damages and any recovery should be reduced pursuant to Mo. Rev. Stat. § 490.715.

11. QT is entitled to credit in the amount of any settlement Plaintiff receives from any tortfeasor, as such credit constitutes a satisfaction and offset pursuant to Mo. Rev. Stat. § 537.060.

12. If Plaintiff suffered any damages, which QT denies, Plaintiff failed to comply with the procedures in Mo. Rev. Stat. §408.040 and is not entitled to prejudgment interest.

13. If Plaintiff suffered any damages, which QT denies, the alleged defect and/or risk was open and obvious and Plaintiff's failure to recognize it directly caused and/or contributed to his alleged damages.

14. If Plaintiff suffered any damages, which QT denies, the alleged defect and/or risk was open and obvious and Plaintiff assumed any and all risk in going near, remaining near, and walking near the alleged defect and/or risk.

15. If Plaintiff suffered any damages, which QT denies, the alleged defect and/or risk was open and obvious and QT had no duty to warn.

16. Plaintiff failed to mitigate his damages.

17. QT reserves the right to raise additional affirmative defenses as may be learned through discovery.

WHEREFORE having fully answered Plaintiff's Petition for Damages, QT prays for judgment in its favor, for its costs and reasonable attorney's fees, and for such other and further relief the Court deems just and proper under the circumstances.

ARMSTRONG TEASDALE LLP

By: /s/ Matthew J. Reh

Matthew J. Reh, #49418
Katherine Ricks, #70322
7700 Forsyth Blvd., Suite 1800
St. Louis, Missouri 63105
Telephone: 314.621.5070
Fax: 314.621.5065
mreh@atllp.com
kricks@atllp.com

ATTORNEYS FOR DEFENDANT
QUIKTRIP CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2020, the foregoing was filed electronically with the Clerk of Court and will be served by operation of the Court's electronic filing system upon all counsel of record.

Robert J. Radice
HORAS, RADICE & ASSOCIATES, LLC
2123 Marconi Avenue
St. Louis, MO 63110
(314) 241-4505
(314) 241-7779 Fax
bradice@HRmidwestlaw.com

ATTORNEYS FOR PLAINTIFF

/s/ Matthew J. Reh

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

PATRICK A. FOGERTY,)	
)	
Plaintiff,)	
)	
vs.)	No. 20SL-CC05124
)	
QUIKTRIP CORPORATION,)	
)	
Defendant.)	
)	
)	

ENTRY OF APPEARANCE

COMES NOW Katherine M. Ricks of Armstrong Teasdale LLP and enters her appearance on behalf of Defendant QuikTrip Corporation.

ARMSTRONG TEASDALE LLP

By: /s/ Katherine M. Ricks
Matthew J. Reh, #49418
Katherine Ricks, #70322
7700 Forsyth Blvd., Suite 1800
St. Louis, Missouri 63105
Telephone: 314.621.5070
Fax: 314.621.5065
mreh@atllp.com
kricks@atllp.com

ATTORNEYS FOR DEFENDANT
QUIKTRIP CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2020, the foregoing was filed electronically with the Clerk of Court and will be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Katherine M. Ricks

EXHIBIT A

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

PATRICK A. FOGERTY,)	
)	
Plaintiff,)	
)	
vs.)	No. 20SL-CC05124
)	
QUIKTRIP CORPORATION,)	
)	
Defendant.)	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Defendant QuikTrip Corporation's First Set of Interrogatories to Plaintiff and First Requests for Production to Plaintiff were sent via email on November 30, 2020, to Robert J. Radice, Horas, Radice & Associates, Llc, bradice@HRmidwestlaw.com

ARMSTRONG TEASDALE LLP

By: /s/ Katherine M. Ricks
Matthew J. Reh, #49418
Katherine Ricks, #70322
7700 Forsyth Blvd., Suite 1800
St. Louis, Missouri 63105
Telephone: 314.621.5070
Fax: 314.621.5065
mreh@atllp.com
kricks@atllp.com

ATTORNEYS FOR DEFENDANT
QUIKTRIP CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2020, the foregoing was filed electronically with the Clerk of Court and will be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Katherine M. Ricks

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

PATRICK A. FOGERTY,)
)
Plaintiff,) Cause No. 20SL-CC05124
)
vs.) Division No. 9
)
QUIKTRIP CORPORATION,)
)
Defendant.)

CERTIFICATE OF SERVICE

Copies of the foregoing Plaintiff's First Set of Interrogatories Directed to Defendant and Plaintiff's First Request for Production Directed to Defendant were emailed to all attorneys of record this 1st day of December, 2020.

In addition, pursuant to the Missouri Rules of Civil Procedure, electronic copies of same in Word Perfect format were also emailed this date to counsel for Defendant.



Robert J. Radice #30697
HORAS, RADICE & ASSOCIATES, LLC
Attorneys for Plaintiff
2123 Marconi Avenue
St. Louis, MO 63110
(314) 241-4505
(314) 241-7779 Fax
bradice@HRmidwestlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served this 1st day of December 2020 via the Court's ECF filing system and email upon: Matthew J. Reh, Esq., Katherine Ricks, Esq., Armstrong Teasdale LLP, Attorneys for Defendant, 7700 Forsyth Blvd., Ste. 1800, St. Louis, MO 63105, mrehab@atltp.com, kricks@atltp.com.

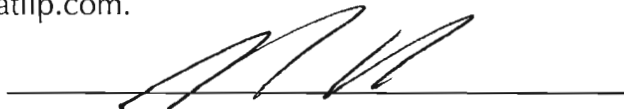


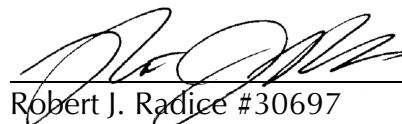
EXHIBIT A

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

PATRICK A. FOGERTY,)	
)	
Plaintiff,)	Cause No. 20SL-CC05124
)	
vs.)	Division No. 9
)	
QUIKTRIP CORPORATION,)	
)	
Defendant.)	

CERTIFICATE OF SERVICE

Copies of the foregoing Plaintiff's Answers to Defendant QuikTrip Corporation's First Set of Interrogatories and Plaintiff's Response to Defendant QuikTrip Corporation's First Requests for Production were served via first class, prepaid U.S. Mail upon all attorneys of record this 28th day of December, 2020.



Robert J. Radice #30697
HORAS, RADICE & ASSOCIATES, LLC
Attorneys for Plaintiff
2123 Marconi Avenue
St. Louis, MO 63110
(314) 241-4505
(314) 241-7779 Fax
bradice@HRmidwestlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served this 28th day of December 2020 via the Court's ECF filing system upon: Matthew J. Reh, Esq., Katherine Ricks, Esq., Armstrong Teasdale LLP, Attorneys for Defendant, 7700 Forsyth Blvd., Ste. 1800, St. Louis, MO 63105, mrehab@atlpl.com, kricks@atlpl.com.

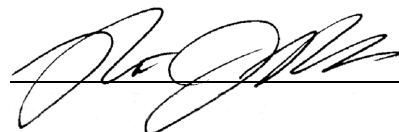


EXHIBIT A